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Attorneys for Defendant
HANJIN SHIPPING CO., LTD.

UNITED STATES DISTRICT COURT FOR
THE NORTHERN DISTRICT OF CALIFORNIA

Chelsea, LLC, Mark Russo, and Allen
Loretz, individually and on behalf of
all others similarly situated,

Plaintiffs,

vs.

Regal Stone, Ltd., Hanjin Shipping
Co., Ltd., Synergy Maritime, Ltd.,
Fleet Management, Ltd., and John
Cota, *In Personam*; M/V Cosco
Busan, their engine, tackle,
equipment, appurtenances, freights,
and cargo, *In Rem*,

Defendants.

) CASE NO.: CV-07-5800 SC
)
) STIPULATION OF PLAINTIFFS
) AND DEFENDANT HANJIN
) SHIPPING CO., LTD. TO
) FURTHER EXTEND THE TIME
) FOR FILING AND SERVICE OF A
) RESPONSE TO PLAINTFFS'
) VERIFIED SECOND AMENDED
) CLASS ACTION COMPLAINT;
) ORDER THEREON
)
) [Civil Local Rule 6-1(b)]

TO THE COURT AND ALL COUNSEL OF RECORD:

IT IS HEREBY STIPULATED by and between plaintiffs CHELSEA, LLC, MARK RUSSO, and ALLEN LORETZ (“Plaintiffs”) and defendant HANJIN SHIPPING CO., LTD, (“Hanjin”), through their respective counsel of record, that the time for Hanjin to file and serve a response to Plaintiffs’ Verified Second Amended Class Action Complaint is further extended by an additional fourteen (14) days. Defendant Hanjin will file and serve its response to Plaintiffs’ Verified Second Amended Class Action Complaint no later than Friday, September 19, 2008. The Court has approved two previous requests by Plaintiffs and Hanjin to extend the time for Hanjin to respond to Plaintiffs’ Verified Second Amended Class Action Complaint.

This stipulation for a further extension of time is not entered into for purposes of delay, but to permit defendant Hanjin to continue its investigation, to address the new allegations contained in Plaintiffs’ Verified Second Amended Class Action Complaint, and to allow defendant Hanjin to formulate a proper response.

IT IS SO STIPULATED AND AGREED.

Dated: September 5, 2008 AUDET & PARTNERS, LLP

By: /s/ William M. Audet (as authorized on 9/5/08)

William M. Audet

Attorney for Plaintiff

CHELSEA, LLC, MARK RUSSO, and
ALLEN LORETZ

Dated: September 5, 2008 FLYNN, DELICH & WISE LLP

By: /s/ Erich P. Wise

Erich P. Wise

Attorney for Defendant

HANJIN SHIPPING CO., LTD

ORDER

Based on the foregoing Stipulation, IT IS HEREBY ORDERED that the time for defendant HANJIN SHIPPING CO., LTD to file and serve a response to the Verified Second Amended Class Action Complaint of plaintiffs CHELSEA, LLC, MARK RUSSO, and ALLEN LORETZ is further extended by an additional fourteen days (14) days. Defendant Hanjin is ordered to file and serve its response to Plaintiffs' Verified Second Amended Class Action Complaint no later than Friday, September 19, 2008.

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated: _____

HON. SAMUEL CONTI
UNITED STATES DISTRICT JUDGE

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